

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION); and THE
HONORABLE AND REVEREND THE BOARD OF
OVERSEERS.

Defendants.

Civil Action No. _____

DECLARATION OF EDWARD J. BLUM

Edward J. Blum, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am an individual over twenty-one years of age, and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and am fully competent to declare as to matters stated herein.

2. I am the President of Students for Fair Admissions, Inc. ("SFFA"), which is an Internal Revenue Code Section 501(c)(3) organization formed for the purpose of defending human and civil rights secured by law, including the right of individuals to equal protection under the law, through litigation and any other lawful means. More specifically, SFFA seeks to promote and protect the right of the public to be free from discrimination on the basis of race in higher education admissions.

3. SFFA is a coalition of prospective applicants and applicants to higher education institutions who were denied admission to higher education institutions, their parents, and other individuals who support the organization's purpose and mission of eliminating racial discrimination in higher education admissions. SFFA has members throughout the country.

4. SFFA has at least one member ("Applicant") who applied for and was denied admission to Harvard's 2014 entering class.

5. Applicant is Asian American.

6. Applicant's parents are first-generation immigrants to the United States from China.

7. Applicant graduated from high school ranked 1 out of 460 students by weighted and un-weighted grade point average.

8. U.S. News and World Report ranks Applicant's high school in the top 5% in the United States.

9. Applicant achieved a perfect score of 36 on the ACT. Applicant achieved a perfect score of 800 for SAT II History and a perfect score of 800 for SAT II Math.

10. Among other academic achievements, Applicant was named an AP Scholar with distinction, a National Scholar, and a National Merit Scholarship semifinalist.

11. While in high school, Applicant participated in numerous extracurricular and volunteer activities. Among other things, Applicant was captain of the varsity tennis team, volunteered at a community tennis camp, volunteered for the high school's student peer tutoring program, was a volunteer fundraiser for National Public Radio, and traveled to China as part of a program organized by the United States Consulate General and Chinese American Students Education and Exchange to assist students in learning English writing and presentation skills.

12. Applicant was denied the opportunity to compete for admission to Harvard on equal footing with other applicants on the basis of race or ethnicity due to Harvard's discriminatory admissions policies.

13. Applicant was accepted to and has enrolled at a university that is ranked in the Top 20 in the nation by U.S. News and World Report. That university does not grant an admissions preference on the basis of race or ethnicity.

14. Applicant is ready, able, and intends to seek to transfer to Harvard when it ceases the use of race or ethnicity as an admissions preference and ceases its intentional discrimination against Asian Americans.

15. SFFA has members who are currently in high school and intend to apply for admission to Harvard ("Future Applicants"). Some of these Future Applicants are Asian American.

16. Future Applicants will be denied the opportunity to compete for admission to Harvard on equal footing with other applicants on the basis of race or ethnicity due to Harvard's discriminatory admissions policies. As a result, Future Applicants may be denied admission to Harvard because of these discriminatory policies.

17. SFFA has members whose children intend to apply for admission to Harvard ("Parents"). Some of these Parents are Asian Americans.

18. Parents' children will be denied the opportunity to compete for admission to Harvard on equal footing with other applicants on the basis of race or ethnicity due to Harvard's discriminatory admissions policies. As a result, Parents' children may be denied admission to Harvard because of these discriminatory policies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, November 14, 2014.



Edward J. Blum